



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

MEMORANDUM

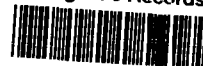
DATE: June 27, 1985

TO: Division File

FROM: David S. Retzlaff *DSR*

SUBJECT: 2010300031 - Winnebago County
Rockford/Rexnord - Rockford Products Plant 3
Subpart F, Pre-Enforcement Conference

EPA Region 5 Records Ctr.



393596

On June 27, 1985 a Pre-Enforcement Conference was held with representatives of Rockford Products Plant 3 in Rockford to discuss the outstanding violations identified during a Subpart F inspection of the facility on April 23, 1985. Those in attendance were Larry Hammond, Rockford Products; Aaron Hardt, Environmental Counsel, Rexnord; Robert Wengrow and David Retzlaff, IEPA.

Rockford Products Plant 3 is in apparent violation of Section 725, Subpart F. The site has a disposal lagoon (See Page Pit) permitted by DWPC (1984-E0-0221) for the disposal of storm water runoff and non-contact cooling water only. Based on admission by Larry Hammond of the discharge of waste oil into the lagoon as recently as January, 1984 and the presence of F002 wastes in the pond, this lagoon should be RCRA regulated.

It should be noted that the first quarter groundwater results (taken 02/21/85) show degradation in one of the downgradient wells.

Rockford Products disagrees that the lagoon should be regulated. They did agree to look into the source of the F002 wastes.

We stressed very strongly that Rockford Products was regulated and that they could 1) Close the lagoon or 2) Comply with Subpart F requirements. Rockford Products agreed to submit to this office by August 16, 1985 a letter explaining in detail what they intend to do in regard to the matter.

DSR/rlg

cc: Rockford Office
Steven Strauss-Enforcement
Mark Haney-Compliance
Cindy Davis-Compliance

RECEIVED

JUL 31 1985

IEPA-DLPC